

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	:	
	:	HON. GENE E.K. PRATTER
	:	
v.	:	CRIM. NO. 18-101
	:	
	:	
MEHDI NIKPARVAR-FARD	:	

ORDER

AND NOW, this \_\_\_\_\_ day of \_\_\_\_\_, 2024, upon consideration of the defendant's *Motion for Return of Passports*, and it appearing to the Court that the conditions of said bonds have been complied with, it is hereby ORDERED that the Clerk of Court for the Eastern District of Pennsylvania deliver to the defendant's wife, Niussha Houshmand, her American and Iranian passports, as well as the American and Iranian passports of the defendant, Mehdi Nikparvar-Fard.

By the Court:

\_\_\_\_\_  
HON. GENE E.K. PRATTER  
JUDGE, U.S. DISTRICT COURT

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EASTERN DISTRICT OF PENNSYLVANIA

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	:	
	:	
MEHDI NIKPARVAR-FARD	:	

MOTION FOR RETURN OF PASSPORTS

The defendant, Mehdi Nikparvar-Fard, by his counsel, Caroline Goldner Cinquanto, Esquire, respectfully requests this Court grant his *Motion for Return of Passports* and in support thereof states the following:

1. On July 7, 2022, this Court released the defendant from pretrial detention subject to certain conditions, including that he and his wife, Niusha Houshmand, surrender their passports to Pretrial Services. [Doc. No. 433]
2. On July 15, 2022, the defendant's wife, Niusha Houshmand, surrendered her American and Iranian passports to Pretrial Services, as well as the American and Iranian passports of the defendant. Pretrial Services then gave the passports to the Clerk of Court for the Eastern District of Pennsylvania.
3. On December 20, 2023, the defendant was sentenced to a period of 107 months' incarceration. The defendant was immediately remanded into the custody of the United States Marshals; consequently, all the terms of the said bonds have now been satisfied.

4. The defendant respectfully requests that the Court issue an Order directing the Clerk of Court for the Eastern District of Pennsylvania to deliver to the defendant's wife, Niusha Houshmand, her American and Iranian passports, as well as the American and Iranian passports of the defendant.

5. AUSA Chris Parisi does not object to this request for the return of passports.

WHEREFORE, the defendant respectfully requests that the Court enter an Order directing the Clerk of Court for the Eastern District of Pennsylvania to return to the defendant's wife, Niusha Houshman, her American and Iranian passports, as well as the American and Iranian passports of the defendant.

Respectfully submitted,

/s/ Caroline Goldner Cinquanto

Caroline Goldner Cinquanto

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Counsel for Mehdi Nikparvar-Fard

Dated: March 1, 2024

CERTIFICATE OF SERVICE

I, Caroline Goldner Cinquanto, hereby certify that on this date I delivered by electronic means a true and correct copy of the foregoing Motion to the following counsel:

AUSA Christopher Parisi  
AUSA Mary Kay Costello  
United States Attorney's Office  
615 Chestnut Street, Suite 1250  
Philadelphia, PA 19106

//s// Caroline Goldner Cinquanto  
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Dated: March 1, 2024